

1 P. STERLING KERR, ESQ.
Nevada Bar No. 3978
2 PETER R. PRATT, ESQ.
Nevada Bar No. 6458
3 LAW OFFICES OF P. STERLING KERR
2450 St. Rose Parkway, Suite 120
4 Henderson, Nevada 89074
Telephone No. (702) 451-2055
5 Facsimile No. (702) 451-2077
Email: sterling@sterlingkerrlaw.com
6 Email: peter@sterlingkerrlaw.com
Attorneys for Plaintiffs

7
8 **IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

9 MINA DE ORO, LLC, a Nevada limited liability
10 company; THE TOY CHEST, LLC a Nevada
limited liability company,

11 Plaintiffs,

12 v.

13 MATTHEW BRENT GOETTSCHE, an
14 individual, JOBEDIAH SINCLAIR WEEKS, an
individual, JOSEPH FRANK ABEL, an
15 individual, SILVIU CATALIN BALACI, an
individual, BITCLUB, an unknown entity, and
16 DOE and ROE Corporations,

17 Defendants.

Case No. 2:20-cv-00994

**AMENDED MOTION FOR ENTRY
OF CLERKS DEFAULT**

18
19 Plaintiffs, MINA DE ORO, LLC, and THE TOY CHEST, LLC, (hereinafter "Plaintiffs"),
20 by and through their counsel, the Law Offices of P. Sterling Kerr, hereby move this Court for
21 entry of the default of Defendant JOSEPH FRANK ABEL in this case.

22 It appearing from the files and records in the above-entitled action that Defendant,
23 JOSEPH FRANK ABEL being duly served on the 13th day of October 2020, with the Summons,
24 and Complaint; that more than twenty-one (21) days, exclusive of the day of service, having
25 expired since service upon Defendant; and that no answer or other appearance having been filed
26 and no further time having been granted, the Default of Defendant for failing to answer or, move,
27 or otherwise plead within the time set forth in the summons is hereby entered.

28 ///

1 A copy of the proposed Default is attached hereto as Exhibit A.

2 Dated this ____ day of February 2021.

3 DEBRA K. KEMPI, CLERK

4
5 By: _____
6 Deputy Clerk

7 Date: _____

8 Respectfully submitted,

9 LAW OFFICES OF P. STERLING KERR

10 
11 _____

12 P. STERLING KERR, ESQ.

13 Nevada Bar No. 003978

14 PETER R. PRATT, ESQ.

15 Nevada Bar No. 6458

16 2450 St. Rose Parkway, Suite 120

17 Henderson, Nevada 89074

18 *Attorneys for Plaintiffs*
19
20
21
22
23
24
25
26
27
28